Gap Analysis Transitional Threshold Baseline Record Decay Maintenance

A. Record Currency and Accumulated Decay

Across successive assessment cycles, the documentation maintained by WOSB-designated contractors operating in Nevada under FAR 52.204-21 obligations has accumulated layered gaps in which the first gap in record currency was not addressed before the second occurred, and the second was not addressed before a third configuration change rendered the documented baseline further from the present environment than any single event would have produced in isolation. The Active FCI Posture Record, whose currency property requires continuous confirmation against the operating environment, reflects across this population a condition in which the interval between documentation activity and the present state has widened through successive unaddressed transitions. Prime contractor documentation review processes observe that the record, where it can be located and produced, carries a baseline that was established at an earlier point and has not been brought through the intervening changes. Documentation either covers the present boundary or it stops at a prior one. The two findings coexist in the record as currently configured. The record exists as a document. Its currency does not extend to the present environment.

B. Layered Configuration Changes and Documentation Response

The first transition in the operating environment occurred when the organization's system configuration changed through a software addition that extended the FCI boundary beyond what the existing documentation addressed. The record was not updated to reflect that change before a personnel addition further extended the boundary into access control territory the documentation did not cover. Both conditions remain present across the interval. Documentation either reaches the current environment or it does not reach it. A third change, the adoption of a cloud storage platform that introduced a new data transmission pathway within the FCI scope, occurred while the prior two changes remained undocumented. Comparable contractors within the same certification and vehicle class exhibit the same layered accumulation in which each transitional event added distance between the documented baseline and the present configuration, and the record at the point of review reflects not a single missed update but a sequence of missed updates whose combined effect is a documented environment that does not resemble the current one.

C. Accessibility at the Point of Review

The record either captures the present state of the boundary or it does not. Where the documentation can be produced, it is accessible in the sense that a file exists and can be opened. The contents of that file address the environment as it was configured before the first of the layered changes described above. The two conditions are both present in the record at the same point. Documentation that has not been confirmed against the current environment remains the only documentation available to prime contractor documentation review processes when the record is requested. The baseline the record carries is a transitional artifact, established at a point that no longer corresponds to the organization's present FCI threshold. Both observations are present within the same assessment interval. The record is present. Its currency is not. The gap between the documented baseline and the current environment is the product of accumulated transitions, each of which passed without confirmation activity occurring.